

# ***EXHIBIT 29***

IN THE UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF TEXAS

SAN ANTONIO DIVISION

\* \* \* \* \*

LA UNION DEL PUEBLO ENTERO, et al \*

v. \* CASE NO. 5:21-cv-844-XR

GREGORY W. ABBOTT, et al \*

\* \* \* \* \*

OCA-GREATER HOUSTON, et al \*

v. \* CASE NO. 1:21-cv-780-XR

JOHN SCOTT, et al \*

\* \* \* \* \*

HOUSTON JUSTICE, et al \*

v. \* CASE NO. 5:21-cv-848-XR

GREGORY WAYNE ABBOTT, et al \*

\* \* \* \* \*

LULAC TEXAS, et al \*

v. \* CASE NO. 1:21-cv-0786-XR

JOHN SCOTT, et al \*

\* \* \* \* \*

MI FAMILIA VOTA, et al \*

v. \* CASE NO. 5:21-cv-0920-XR

GREG ABBOTT, et al \*

\* \* \* \* \*

1 UNITED STATES OF AMERICA \*

2 v. \* CASE NO. 5:21-cv-1085-XR

3 THE STATE OF TEXAS, et al \*

4 \* \* \* \* \*

5

6 ORAL AND VIDEOTAPED DEPOSITION OF

7 ISABEL LONGORIA

8 APRIL 20, 2022

9 VOLUME 1 OF 2

10

11 Oral and videotaped deposition of Isabel Longoria,

12 produced as a witness at the instance of the plaintiffs, and duly

13 sworn, was taken in the above-styled and numbered cause on April

14 20, 2022, from 2:45 p.m. to 4:56 p.m., before Terrie Doyle

15 Escobar, CSR in and for the State of Texas, reported by oral

16 stenography, at the Office of the Texas Attorney General,

17 Consumer Protection Division, Houston Regional Office, 808 Travis

18 Street, Suite 1520, Houston, Texas 77002, pursuant to Rule 30 of

19 the Federal Rules of Civil Procedure.

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21 APPEARANCES:

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23 FOR THE PLAINTIFFS:

24 MR. KENNETH E. BROUGHTON

25 REED SMITH, LLP

1 expansion of early voting for three weeks instead of two weeks.

2 Q. In 2020, did you have the authority to offer more early  
3 voting days if you determined Harris County wanted that, or is  
4 that something that's just prescribed by either the governor or  
5 the secretary of state?

6 A. As I remember correctly, the governor's order allowed  
7 for an expansion of three weeks. I can't remember -- or an extra  
8 week of early voting. I can't remember if Harris County had the  
9 option to engage in it or if it was mandated that all counties  
10 engage in three weeks of early voting. I'd be happy to look that  
11 up. I can't remember the difference.

12 Q. Do you recall what hours the polls were opened during  
13 early voting for the 2020 election?

14 A. On most weekdays of early voting the polls would have  
15 been open from 7:00 a.m. to 7:00 p.m. with the exception of  
16 Sundays in which voting was open from -- I believe at that time  
17 -- I can't remember if it was noon to 7:00 p.m. or noon to 6:00  
18 p.m. And then on -- there was three days, if I'm not mistaken,  
19 of expanded voting where voting was offered until 10:00 p.m. and  
20 one day where voting was offered continuously for 24 hours. And  
21 I -- we can -- I'm happy to provide to you and look back on the  
22 record on the exact number of expanded hour days.

23 Q. Okay. Who decided -- who gets to decide what hours the  
24 polls open and close in Harris County for the 2020 election?

25 A. The early voting clerk who -- which at the time was

1 in our voter registration department, increasing more staff or  
2 the clearance for paying more staff on the early voting ballot  
3 board signature verification committee and central counting  
4 station. I believe they had to at one point either double or  
5 triple the staff that they would have normally had for an  
6 election of this size in order to research every single mail  
7 ballot that came in, where before when all you had to do was  
8 compare the signature and that took a matter of -- well,  
9 actually, I know -- it took exactly five seconds to either  
10 approve or reject a mail ballot. Since then, it has increased to  
11 between 30 seconds and one minute to process any given mail  
12 ballot carrier envelopes since you have to do that kind of ID  
13 research.

14 MR. BROUGHTON: I know we were going to quit at  
15 about 5:00. It's 4:56, and I have like a whole different topic.  
16 So probably it makes sense just to quit now; right?

17 MR. THOMPSON: That's fine.

18 MR. BROUGHTON: Okay. And we'll recess for the  
19 day.

20 THE VIDEOGRAPHER: Off record at 4:56.

21 (Proceedings adjourned at 4:56 p.m.)  
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